

Annmarie Chiarello – SBT #24097496

WINSTEAD PC

500 Winstead Building

2728 N. Harwood Street

Dallas, Texas 75201

Telephone: (214) 745-5400

Faxsimile: (214) 745-5390

E-mail: achiarello@winstead.com

**ATTORNEYS FOR SOUTHERN METHODIST
UNIVERSITY**

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

IN RE:	§	Case No. 18-32177-s gj11
FOUNDRY CLUB, LLC,	§	Chapter 11
Debtor.	§	
	§	

WITNESS AND EXHIBIT LIST FOR MOTION TO CONVERT

Southern Methodist University ("SMU"), a creditor and a party-in-interest in this case, files this Witness and Exhibit List in connection with the December 17, 2018 hearing (the "Hearing") on the Foundry Club, LLC's (the "Debtor") *Motion to Convert* [Docket No. 44] (the "Motion") and designate the following witnesses and exhibits:

WITNESSES

1. Any witness designated or called by any other party; and
2. Any impeachment or rebuttal witnesses.

EXHIBITS

Exhibit	Description	Off.	Obj.	Adm.
A.	Invoice sent by the Debtor to SMU for the Security Deposit			
B.	Security Agreement Checked Cashed			
C.	Invoice sent by the Debtor to SMU for September Charges			
D.	Cashed September Check			

Exhibit	Description	Off.	Obj.	Adm.
E.	<i>Order on Creditor CPUS Mockingbird, LP's Motion to Compel Assumption or Rejection of Lease Agreement [Docket No. 35]</i>			
F.	<i>Order Granting Creditor CPUS Mockingbird LP,'s Motion for Relief from the Automatic Stay [Docket No. 36]</i>			
G.	<i>Schedules [Docket No. 15]</i>			
H.	<i>Creditor Matrix [Docket No. 6].</i>			
I.	<i>Statement of Financial Affairs [Docket No. 16]</i>			
J.	Foundry Club Enterprise Client Agreement, dated February 6, 2018			
K.	Any pleadings, reports, or other documents filed in the Debtor's bankruptcy case, including summaries thereof; and			
L.	Any impeachment or rebuttal exhibits or any exhibits designated by any other party.			

SMU reserves the right to amend or supplement this Witness and Exhibit List at any time prior to the Hearing and/or in compliance with the Local Bankruptcy Rules and the Orders of this Court. SMU further reserves the right to provide any documents amended or supplemented in this Witness and Exhibit List to opposing counsel and to this Court as they become available.

Dated: DECEMBER 12, 2018

Respectfully submitted,

WINSTEAD PC
 500 Winstead Building
 2728 N. Harwood Street
 Dallas, Texas 75201
 (214) 745-5400 (Telephone)
 (214) 745-5390 (Facsimile)

By: /s/ Annmarie Chiarello
 Annmarie Chiarello – SBT #24097496

**ATTORNEYS FOR SOUTHERN
 METHODIST UNIVERSITY**

CERTIFICATE OF SERVICE

I hereby certify that on December 12, 2018, a true and correct copy of the foregoing was electronically mailed to the parties that are registered or otherwise entitled to receive electronic notices in this case.

/s/ *Annmarie Chiarello*

One of Counsel

4827-0505-8690v.1
40296-122 12/12/2018